

Exhibit A
DEFENDANT NYRA'S PROPOSED EXHIBIT LIST

Defendant NYRA anticipates that it may introduce the following exhibits at trial. In addition, Defendant NYRA reserves its right to introduce any exhibit listed by Plaintiff or defendant Local Union No.3. Further, Defendant NYRA reserves its right to introduce documents, including portions of deposition testimony, not identified on this Exhibit List in rebuttal to any testimony given, witnesses called or exhibits introduced by Plaintiff or defendant Local Union No.3.

EXHIBIT	DESCRIPTION	BATE STAMP
A	Collective Bargaining Agreement, Division of Pari-Mutuel Employees, Local Union No. 3, IBEW, and The New York Racing Association	Bate stamped NYRA-000001 through 000034
B	Mutuel Department Request for Leave of Absence	Bate stamped NYRA-000048
C	Copy of email from David A. Smukler to Plaintiff, dated April 14, 2011	Bate stamped NYRA-000045
B	Copy of letter from Sal Zammitto to Patrick Mahony	Bate stamped NYRA-000057
E	COBRA Documents addressed to Plaintiff, dated January 6, 2011	Bate stamped NYRA-000079 through 85
F	Mutuel Department Employee Record	Bate stamped NYRA-000062
G	Letter to Plaintiff from Rascal Singh, dated June 25, 2008	Bate stamped NYRA-000066
H	NYRA Mutual Department Work Rules Violations Reports	Bate stamped NYRA-000051 through 56
I	NYRA Management Guide	Bate stamped NYRA-000263 through 270
J	Copy of email from Bonnie Parente to Patrick Mahony dated August 6, 2011	Bate stamped NYRA-000248
K	Plaintiff's Tax returns for 2008	
L	Plaintiff's Tax returns for 2009	
M	Plaintiff's Tax returns for 2010	
N	Plaintiff's Tax returns for 2011	
O	Any updated tax documents based on the date of trial	
P	New York Workers' Compensation Documents from Plaintiff's April 2, 2012 accident	